

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ACCESS TO NON-PUBLIC INFORMATION IDENTIFIED
AS USPS-LR-N2012-1/ NP9
(April 11, 2012)

On April 6, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Access to Non-Public Information Identified as USPS-LR-N2012-1/NP9. Accompanying this Motion was the signed certifications of several APWU representatives, consultants and attorneys. However, one APWU representative was unable to complete their Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b) in time to be included in the filing. A certification applicable to USPS-LR-N2012-1/NP9, for the following individual has now been completed:

Phillip A. Tabbita,
Manager, Negotiation Support and Special Projects
American Postal Workers Union, AFL-CIO

A copy of the Certification is attached hereto.

Counsel for APWU has conferred with USPS and has been assured that it does not object to Mr. Tabbita accessing the information contained in USPS-LR-N2012-1/NP9. For this reason and for those reasons stated in our April 6, 2012 Motion for Access, which was granted on April 9, 2012, APWU respectfully requests that the above named individual be granted immediate access to the non-public Library Reference USPS-LR-N2012/1NP9.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.

Conclusion

For the forgoing reasons and the reasons stated in APWU's Motion for Access, filed April 6, 2012 APWU respectfully requests that access to Library Reference USPS-LR-N2012-1/NP9 granted to the above named individual.

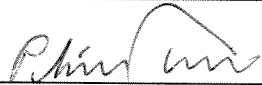
Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP9** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Phillip Tabbita</u>
Firm	<u>American Postal Workers Union, AFL-CIO</u>
Title	<u>MGR Negotiation Support</u>
Representing	<u>American Postal Workers Union, AFL-CIO</u>
Signature	<u></u>
Date	<u>APRIL 5, 2012</u>